

Before the Federal Communications Commission
Washington, D.C. 20554

In the Matter of)	WT Docket No. 98-143
)	
1998 Biennial Regulatory Review)	RM-9148
Amendment of Part 97 of the)	RM-9150
Commission's Amateur Service Rules.)	RM-9196

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Summary

Morse code proficiency requirements are obsolete.
The number of Amateur license classes should be reduced.
97.303(e)5 is flawed and needs revision; too much authority is given to AMTS.

Morse code

I strongly believe that the Morse code proficiency requirement in Amateur Radio has long since outlived its usefulness and is now merely an obsolete throwback to earlier times, even primitive times in radio communications.

The argument that Morse code will "get through when no other communications can" is no longer valid. I myself have witnessed digital communications that easily outperform a human using Morse code. While Morse code may be a more robust mode than many others, one can make an analogous argument that a man on horseback can go where cars can't. However, we surely wouldn't dream of requiring horse-riding proficiency testing in order to get a driver's license. Likewise, the requirement for Morse code proficiency is equally obsolete.

In recent years, the Coast Guard, Civil Air Patrol, Military Amateur Radio Service, and others have ceased to use Morse code or even monitor emergency channels in Morse code. I have also heard from knowledgeable sources that the original need for Morse code proficiency was so that the government would have a standard way of communicating with Amateur radio operators in order to tell them to cease operation in times of war. That was early this century. The reason for Morse testing has long since passed, but in true bureaucratic fashion, the requirement remains. It's past time to fix that.

I understand that international treaties require Morse code proficiency for amateur licensing on

shortwave. However, the current FCC requirements go far beyond the minimum required. I strongly feel that Morse code testing requirements should be reduced to the minimum to satisfy those treaties. Until the international treaty requirements are changed, there should be only one code test for any amateur licence and that should be at the minimum required speed, (which I understand is 5 WPM). No purpose is served to make this requirement any stronger.

Furthermore, once the international regulations drop Morse code proficiency requirements (as it seems will happen before too long), the FCC should soon thereafter likewise drop Morse code proficiency requirements.

Also, I believe that having a stronger Morse code requirement only serves to discourage modern technically-inclined people from getting into amateur radio. With computers and other technology progressing quickly, amateur radio is sliding further and further behind. It's important to not discourage new people from getting involved in amateur radio because of obsolete Morse code proficiency requirements.

I'm not saying Morse code should be done away with. Anyone who enjoys using this mode should be free to do so, but it is wrong to continue making proficiency in it a requirement.

Amateur Radio Classes

The FCC has suggested reducing the number of amateur license classes. I couldn't agree more. However, I feel there should be no more than three classes: Beginner, Intermediate, and Advanced. (Perhaps we could call them Novice, General, and Advanced.)

The current Advanced and Extra class should be combined into a new "Advanced class." The current Extra class written test requirement should be used for the new Advanced class. The current General class could be left as is. And all classes below General should be combined into a new Novice class (or whatever you want to call it).

Furthermore, as long as the FCC must test for Morse code proficiency as required by international treaty, all classes should test for no more than the minimum proficiency. If it is decided that the lowest class may not have shortwave privileges, that class should not have any code testing requirement.

As for the Morse code test itself, I think just listening to a brief recording of the code followed by multiple choice questions about the content would be adequate.

If the Morse code testing requirements are reduced, I favor making the technical (written) portion of the license test more rigorous. The argument that lessening the code requirement would make amateur radio more like CB by letting in just anyone is bogus since a technical written test is still required. In my opinion, the arguments to keep the Morse code proficiency requirement, are either sour grapes (I had to learn it, so should everyone else) or a misguided attempt to maintain amateur radio as a kind of "good ol' boys" club.

Other Rules

Since the FCC is apparently reviewing all of Part 97, there is one more serious flaw that needs to be corrected. I'm speaking of 97.303(e) paragraph five:

No amateur station may transmit in the 219-220 MHz segment from a location that is within 80 km of an AMTS Coast Station unless the amateur station licensee holds written approval from that AMTS licensee.

For starters, I think it is outrageous that the FCC would abdicate its authority like that. I'm not an expert on this, but to my knowledge, there are no other cases where a private license holder has absolute veto power over another user or service on frequencies that they may not even share.

An AMTS station has no incentive to grant permission. And experience has shown that they are motivated to deny permission, even if they would not be affected either way.

The biggest outrage--and the biggest reason for changing this law--is that an AMTS station has authority over the whole band segment, regardless of their usage. An AMTS licensee could be on only one channel at the lower end of the 219-220 band, yet still be able to deny permission to amateur activity on only one channel at the other end of the band! If the channel were shared, an argument could be made for requiring permission from the primary channel user (AMTS), but that's not necessarily the case here. An AMTS station should not have any say over frequency usage far removed from their channel.

I highly recommend 97.303 (e) paragraph five be changed to read:

*No amateur station may transmit **on the same frequency** in the 219-220 MHz segment as an AMTS Coast Station from a location that is within 80 km of that AMTS Coast Station unless the amateur station licensee holds written approval from that AMTS licensee.*

Existing restrictions on RF spilling over into adjacent channels should be adequate. However, it would be acceptable to have an added specification here that sets a power threshold before this paragraph applies. For example, permission might be required if the amateur station transmissions are noticed by the AMTS station or if more than a certain amount of power from the amateur station appears on the AMTS frequency.

